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8 *Attorneys for Plaintiffs*
9 MAUREEN GREENSTONE, individually, and
as Appointed Guardian of SETH DALE
GREENSTONE, an Adult Protected Person

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11 **UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA (LAS VEGAS)**

12 MAUREEN GREENSTONE, individually, and
13 as Appointed Guardian of SETH DALE
GREENSTONE, an Adult Protected Person,

14 Plaintiffs,

15 vs.

16 LAS VEGAS METROPOLITAN POLICE
17 DEPARTMENT; VIDAL CONTRERAS; DOES
1-10, inclusive,

18 Defendants.

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20 Case No. 2:23-cv-00290-GMN-NJK

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
PLAINTIFFS TO FILE RESPONSES TO
DEFENDANTS' MOTIONS FOR
SUMMARY JUDGMENT**

21 The parties stipulate and agree to the following:

22 1. On April 29, 2024, VIDAL CONTRERAS filed a motion for summary
judgment. Dkt. 52. The deadline for Plaintiffs to respond to CONTRERAS' motion is
23 May 20, 2024.

24 2. On May 1, 2024, LVMPD filed a motion for summary judgment. Dkt. 56.

25 The deadline for Plaintiffs to respond to LVMPD's motion is May 22, 2024.

3. Local Rule IA 6-1 governs the parties' stipulation and request. Plaintiffs' counsel is requesting an extension because he has numerous other commitments including: a hearing in Phoenix Arizona before the Ninth Circuit Court of Appeals on May 13, 2024 (Scott v LVMPD), oppositions to two motions to dismiss in another federal court case (Esparza v LVMPD), as well as numerous depositions and a motion to amend in a third federal case (Smith v. Wellpath, LLC). Additionally, Plaintiffs' counsel is co-counseling a case that is set for trial on June 16, 2024 (Lawrence v. LVMPD).

4. The parties stipulate and agree that good cause exists to extend the deadlines for Plaintiffs to file responses to the Defendants' summary judgment motions.

5. For these reasons, the parties respectfully request that the Court extend the briefing deadlines as follows: Plaintiffs' response to both Defendants' motions for summary judgment will become due on June 21, 2024, and Defendants' replies will become due on June 28, 2024.

6. The parties stipulate and agree that this extension will not unnecessarily delay resolution of this case. The extension will ensure that the parties can prepare adequate briefs for the Court to make a ruling on the merits.

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

DATED: May 3, 2024

1 DATED this 2nd day of May 2024.

2 PETER GOLDSTEIN LAW CORP

3 /s/ Peter Goldstein

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